

1  
2 LOUIS A. LEONE, ESQ. (SBN: 099874)  
3 CLAUDIA LEED, ESQ. (SBN: 122676)  
4 **STUBBS & LEONE**  
5 A Professional Corporation  
6 2175 N. California Blvd., Suite 900  
7 Walnut Creek, CA 94596  
Telephone: (925) 974-8600  
Facsimile: (925) 974-8601  
E-mail: [leonel@stubbsleone.com](mailto:leonel@stubbsleone.com)  
[leedc@stubbsleone.com](mailto:leedc@stubbsleone.com)

8 Attorneys for Defendants  
9 THE REGENTS OF THE UNIVERSITY OF CALIFORNIA,  
10 PAMELA E. ROSKOWSKI, JON EASTERBROOK, and  
11 BARNEY RIVERA

12 PAMELA Y. PRICE, ESQ. (SBN:107713)  
13 PRICE AND ASSOCIATES  
14 901 Clay Street  
Oakland, California 94607  
Telephone: (510) 452-0292  
Facsimile: (510) 452-5625  
E-mail: [pypesq@aol.com](mailto:pypesq@aol.com)

15 Attorneys for Plaintiff  
16 REGGIE HAMILTON

17 CURTIS E. ALLEN, ESQ. (SBN: 187748)  
18 LAW OFFICE OF CURTIS ALLEN  
19 303 Twin Dolphin Drive, Sixth Floor  
Redwood City, California 94065  
Telephone: (650) 868-6620  
Facsimile: (650) 362-1864  
E-mail: [curtis.e.allen.esq.@gmail.com](mailto:curtis.e.allen.esq.@gmail.com)

20 Attorneys for Plaintiff  
21 REGGIE HAMILTON

22 UNITED STATES DISTRICT COURT  
23 NORTHERN DISTRICT OF CALIFORNIA

24 REGGIE HAMILTON,

25  
26 Plaintiff,

27 vs.

28 THE REGENTS OF THE UNIVERSITY OF  
CALIFORNIA, PAMELA E. ROSKOWSKI,

**Case No.: C10-01622 DMR**

**STIPULATION AND ORDER  
EXTENDING DEADLINE TO MEDIATE  
AND TO RESCHEDULE CASE  
MANAGEMENT CONFERENCE**

1  
2 JON EASTERBROOK, BARNEY RIVERA  
3 and DOES 1 through 15,  
4 Defendants.

5  
6 The parties to the above captioned action hereby stipulate by and through their  
7 undersigned counsel of record to request that this court extend the deadline to mediate  
8 this case to May 2, 2011. Good cause exists for the request to extend the deadline as  
9 follows:

- 10 1. More the time was required to meet and confer regarding the Stipulation and  
11 Proposed Protective Order then originally anticipated. The Stipulation of  
12 Counsel to a Proposed Protective Order was a prerequisite to disclosing  
13 documents pursuant to the parties' Rule 26 Disclosures and other discovery  
14 necessary to prepare for mediation.
- 15 2. Although this delay in agreeing to the wording of the proposed protective  
16 order was attributed to the closure and relocation of plaintiff's counsel's office,  
17 and consequently her unavailability to respond to defense counsel's requests  
18 to review and approve the proposed order, the parties are now in a position to  
19 commence the discovery necessary to prepare for mediation;
- 20 3. Recently, the parties agreed to the selection of a mediator, JoAnne  
21 Dellaverson and are currently working on scheduling mediation on one of  
22 several dates in the last two weeks April, 2011.
- 23 4. The parties are actively engaged in settlement negotiations. Plaintiff has  
24 submitted a settlement demand to Defendants with a response date of  
25 February 23, 2011.

26 Therefore the parties request that the deadline to mediate this case be extended  
27 to May 2, 2011, to encompass the last of the several dates offered by Ms. Dellaverson;

28 The parties further request that the court continue the Case Management  
Conference in this matter from February 9, 2011 to May 11, 2011.

1  
2 **IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.**  
3

4 PRICE AND ASSOCIATES  
5

6 DATED: \_\_\_\_\_

\_\_\_\_\_/S/  
PAMELA Y. PRICE, ESQ.  
Attorneys for Plaintiff REGGIE  
HAMILTON

9 DATED: \_\_\_\_\_

LAW OFFICE OF CURTIS E. ALLEN

11 DATED: \_\_\_\_\_

12 \_\_\_\_\_/S/  
CURTIS E. ALLEN, ESQ.  
Attorneys for Plaintiff REGGIE  
HAMILTON

14 STUBBS & LEONE  
15

16 DATED: \_\_\_\_\_

\_\_\_\_\_/S/  
CLAUDIA LEED, ESQ.  
Attorneys for Defendants THE  
REGENTS OF THE UNIVERSITY OF  
CALIFORNIA,  
PAMELA E. ROSKOWSKI, JON  
EASTERBROOK, and BARNEY  
RIVERA

**ORDER**

**GOOD CAUSE APPEARING**, and pursuant to the stipulation of the parties, the Court hereby orders the following: The Court grants an extension of the completion of the mediation through the Northern District of California ADR Program to May 2, 2011. The Court grants the continuation of the Further Case Management Conference from February 9, 2011 to May 11, 2011 at 1:30 p.m. Parties must file an updated joint case management conference statement by May 4, 2011. These extensions does not affect any other dates as set forth on the Court's Case Management and Pretrial Order filed on October 8, 2010.

**IT IS SO ORDERED.**

DATED: 2/9/2011



DONNA M. RYU  
United States Magistrate Judge